



BLEAKLEY PLATT & SCHMIDT, LLP

NEW YORK | CONNECTICUT


MEMO ENDORSED

April 18, 2024

VIA ECF

Hon. Edgardo Ramos
U.S. District Court, S.D.N.Y.
Thurgood Marshall Federal Courthouse
40 Foley Square
New York, NY 10007

Plaintiff's request to file the amended complaint under seal is granted. Plaintiff is directed to file the redacted version for public view. SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: 4/19/24
New York, New York

Re: *Bell Semiconductor, LLC v. Broadcom Corp. et al.*, 24-cv-0156

Dear Judge Ramos,

My firm represents the plaintiff in the above-captioned action. In accordance with Section 3 of Your Honor's Individual Practices, and on consent of the defendants, we respectfully request permission to file the plaintiff's amended complaint under seal. Specifically, we seek to redact those portions of the amended complaint that cite to or reveal information regarding confidential provisions of the parties' underlying agreement.

By way of background, this is a breach of contract suit stemming from a patent assignment agreement between Bell Semic, Hilco Patent Acquisition 56 LLC, Bell Northern Research, LLC, and Defendants, executed on November 30, 2017. Paragraph 8.1 of this Agreement prohibits the parties from disclosing its terms, which shall be kept "confidential." This confidentiality provision was intended to keep the negotiated terms of the transactions secret from competitors and potential future transactional counterparties.

To comply with this provision, we propose filing our amended complaint and the attachment thereto with certain redactions, which are highlighted in the documents filed together herewith. The redacted text will be visible to all parties and to the Court but not the general public. A similar application, for the original complaint, was granted by the New York State Supreme Court prior to removal and subsequently renewed by Judge Caproni. (ECF Dkt. No. 3.) The amended complaint makes no substantive changes vis a vis the original redactions.

Thank you for your consideration.

Sincerely,

/s/ David H. Chen

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cc: All parties (via ECF)